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Attorneys for Defendant
VASILE MEREACRE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA.

Case No. CR 18-348 LHK (NC)

Plaintiff,

V.

VASILE MEREACRE.

**STIPULATION AND [PROPOSED]
ORDER TO MODIFY
CONDITIONS OF PRETRIAL
RELEASE**

Defendant.

1 IT IS HEREBY STIPULATED by the parties through their counsel that defendant
2 VASILE MEREACRE may reside and be supervised in the Southern District of Florida
3 in lieu of the Middle District of Florida.

4 By way of background, and in support of this stipulation, Defendant states the
5 following:

6 1. Defendant is charged by Indictment with Conspiracy to Violate 18 U.S.C. §§
7 1030(a)(7)(B) and (c)(3)(A) and Extortion Involving Computers in violation of 18 U.S.C.
8 §§ 1030(a)(7)(B) and (c)(3)(A) in this District under Case No.: CR-18-00348-LHK.

9 2. On October 16, 2018, Defendant was taken into federal custody in the Southern
10 District of Florida based on the arrest warrant in the above captioned case.

11 3. On October 22, 2018, Magistrate Judge Patrick A. White (Southern District of
12 Florida) released Defendant on bond with the following conditions of pre-trial release
13 pursuant to a stipulation between the United States and Defendant:

14 a. \$250,000.00 Personal Surety Bond co-signed by Defendant's parents,
15 Nicolae and Liuba Mereacre;

16 b. \$100,000.00 Corporate Surety Bond secured by Defendant's parents
17 property located in Palm Coast, Florida;

18 c. Defendant to reside at 109 Laguna Forest Trail, Palm Coast, Florida
19 32164 (Middle District of Florida) during the pendency of the case;

20 d. Home Confinement monitoring;

21 e. Defendant shall post a \$25,000.00 cashier's check payable to the Clerk
22 of U.S. District Court for the Middle District of Florida within 48 hours of his
23 release from custody;

24 f. Report to Pre-Trial Services as directed in the Middle District of Florida
25 with the following special conditions:

26 i. Surrender all passports and travel documents;

27 ii. No computer access except for communicating with his counsel;

iii. Defendant shall report weekly in person or by telephone to his counsel.

g. Defendant shall appear before the Honorable Susan van Keulen, United States Magistrate Judge in the Northern District of California on November 8, 2018 at 1:30 p.m. at 280 South First Street, San Jose, California 95113.

6 4. On October 24, 2018, Defendant filed an Unopposed Motion to Modify
7 Conditions of Pretrial Release (see FLSD 1:18-MJ-03533 AOR, ECF Doc 11) requesting
8 the modifications noted below. On October 25, 2018, the Honorable Patrick A. White
9 denied that motion without prejudice, noting that the “motion may be re-filed in the
10 Northern District of California, where jurisdiction in this case lies.” (See FLSD 1:18-MJ-
11 03533 AOR, ECF Doc 12).

12 5. Defendant therefore requests this Court to modify his pre-trial release
13 conditions as follows:

22 c. Allow Defendant to make cashier's check payable to the United States
23 District Court for the Southern District of Florida in lieu of the Middle District of
24 Florida

25 6. Undersigned counsel have conferred with AUSA Susan Knight who agrees to
26 the requests set forth in this stipulation.

27 //

1 SO STIPULATED:

2 Dated: October 25, 2018

3 _____/s/ _____
4 Christopher G. Lyons
5 Ronald Gainor
6 Adam Pennella
7 Counsel for Vasile Mereacre

8 Dated: October 25, 2018

9 ALEX G. TSE
10 Acting UNITED STATES ATTORNEY

11 _____/s/ _____
12 Susan Knight
13 Assistant United States Attorney

14 SO ORDERED:

15 Dated:

16 _____
17 Honorable Nathaniel Cousins
18 United States Magistrate Judge